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CONNECTU, INC.

10
11 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 THE FACEBOOK, INC. and MARK
14 ZUCKERBERG,

15 Plaintiffs,

16 v.

17 CONNECTU, INC. (formerly known as
CONNECTU, LLC), PACIFIC NORTHWEST
18 SOFTWARE, INC., WINSTON WILLIAMS,
and WAYNE CHANG,

19 Defendants.
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CASE NO. 5:07-CV-01389-JW
**CONNECTU'S ADMINISTRATIVE
MOTION TO SEAL:**

**(1) ADMINISTRATIVE REQUEST
PURSUANT TO CIVIL L.R. 7-11 TO
RESCHEDULE HEARING ON
FACEBOOK AND MARK
ZUCKERBERG'S MOTION TO
ENFORCE ALLEGED SETTLEMENT
AGREEMENT;**

**(2) DECLARATION OF STEVEN C.
HOLTZMAN IN SUPPORT
THEREOF;**

**(3) [PROPOSED] ORDER GRANTING
CONNECTU'S ADMINISTRATIVE
REQUEST PURSUANT TO CIVIL L.R.
7-11 TO RESCHEDULE HEARING ON
FACEBOOK AND MARK
ZUCKERBERG'S MOTION TO
ENFORCE ALLEGED SETTLEMENT
AGREEMENT; AND**

**(4) CONNECTU, INC.'s REPLY IN
SUPPORT OF MOTION TO SHORTEN
TIME FOR MOTION FOR EXPEDITED
DISCOVERY AND EVIDENTIARY
HEARING**

CONNECTU'S MOTION TO SEAL
5:07-CV-01389-JW

1 Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this
2 administrative motion asking the Court to file under seal (1) Administrative Request Pursuant To
3 Civil L.R. 7-11 To Reschedule Hearing On Facebook And Mark Zuckerberg's Motion To
4 Enforce Alleged Settlement Agreement; (2) Declaration Of Steven C. Holtzman In Support Of
5 Connectu's Administrative Request Pursuant To Civil L.R. 7-11 To Reschedule Hearing On
6 Facebook And Mark Zuckerberg's Motion To Enforce Alleged Settlement Agreement; (3)
7 [Proposed] Order Granting Connectu's Administrative Request Pursuant To Civil L.R. 7-11 To
8 Reschedule Hearing On Facebook And Mark Zuckerberg's Motion To Enforce Alleged
9 Settlement Agreement; and (4) Connectu, Inc.'s Reply In Support Of Motion To Shorten Time
10 For Motion For Expedited Discovery And Evidentiary Hearing.
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12 The parties entered into, and the Superior Court of California, Superior County issued, a
13 Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public
14 record any documents that have been designated as "Confidential" or "Highly Confidential"
15 pursuant to the protective order.
16

17 ConnectU's Administrative Request Pursuant To Civil L.R. 7-11 To Reschedule Hearing
18 On Facebook And Mark Zuckerberg's Motion To Enforce Alleged Settlement Agreement and
19 documents filed in support thereof and Connectu, Inc.'s Reply In Support Of Motion To Shorten
20 Time For Motion For Expedited Discovery And Evidentiary Hearing contain information that
21 Facebook has asserted is covered by the Protective Order and/or are alleged by Plaintiffs to
22 implicate confidentiality provisions found in a purported agreement which is the subject of
23 dispute between the parties.¹

24 ConnectU requests that its Administrative Request Pursuant To Civil L.R. 7-11 To
25 Reschedule Hearing On Facebook And Mark Zuckerberg's Motion To Enforce Alleged
26

27 ¹ By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or
28 inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of
information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported
agreement.

1 Settlement Agreement and documents filed in support thereof and Connectu, Inc.'s Reply In
2 Support Of Motion To Shorten Time For Motion For Expedited Discovery And Evidentiary
3 Hearing remain sealed.

4 Dated: May 23, 2008

5 /s/ Steven C. Holtzman

6 Steven C. Holtzman

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21 Attorneys for Defendant
22 CONNECTU, INC.
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CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 23, 2008.

Dated: May 23, 2008

/s/ Steven C. Holtzman
Steven C. Holtzman